

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

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| In Re: | Case No.: 16-30351 |
| Blake Fitzgerald, Debtor. | Chapter 13 Case |

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

Blake Fitzgerald, as his Response to the Trustee's Motion to Dismiss, resists the Motion for the following reason:

1. Debtor acknowledges that he is in default with his Chapter 13 Payments.
2. Debtor intends to become current with his payments.
3. Debtor acknowledges that he hasn't provided the Trustee with copies of his 2017 Federal and State Tax Returns yet.
4. Debtor has filed for an extension with the IRS to file his taxes. He has been advised by counsel that he needs to get them filed as soon as possible; therefore, Debtor respectfully requests the Court set this matter on for hearing.

WHEREFORE, Debtor respectfully requests that the Court deny Trustee's Motion For Dismissal and set this matter on for hearing no sooner than August 1, 2018 to allow the Debtor to prepare and file his 2017 Federal and State Taxes.

Dated this 3rd day of July, 2018.

/s/ Bruce L. Madlom
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